

# **Exhibit G**

IN THE CHANCERY COURT OF RANKIN COUNTY, MISSISSIPPI  
TWENTIETH JUDICIAL DISTRICT

AMERICAN CIVIL LIBERTIES UNION OF  
MISSISSIPPI and CENTER FOR  
CONSTITUTIONAL RIGHTS,

Plaintiffs,

vs.

RANKIN COUNTY DISTRICT  
ATTORNEY'S OFFICE,

Defendant.

Civil Action No. \_\_\_\_\_

**DECLARATION OF RONALD SHINSTOCK**

I, Ronald Shinstock, hereby declare under the penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am 51 years old and in the custody of the Mississippi Department of Corrections. I am presently incarcerated at the East Mississippi Correctional Facility.
2. I am serving a 40-year sentence following my conviction, at a one-day trial in May 2016, for Sale of Methamphetamine.
3. The events leading to my conviction occurred on March 14, 2015, when I was arrested by sheriff's deputies with the Rankin County Sheriff's Department, including Brett McAlpin.
4. At first, an informant working with the RCSD came to my home. According to the prosecution he gave me \$260 to buy methamphetamine.
5. Then, after the informant left my home, Brett McAlpin and several more RCSD deputies raided it.

6. I was never presented with a warrant of any kind, and as far as I know the deputies did not have one.
7. Two of my friends were at my home when the deputies raided it. The deputies first took my friend John outside the house.
8. The deputies later led me outside. When I got outside, I saw RCSD deputies lift John up by the nostrils with two fingers. I could see that he was beaten and there was blood coming from his ears.
9. The deputies demanded that I tell them where they could get more methamphetamine and that I need to call someone to purchase more drugs. When I told them I didn't know who to call they became physically violent.
10. Two deputies began to slap me and hit me. They instructed me to drop my pants and underwear. I complied. The officers then threatened to beat me in the genitals with a large flashlight if I did not give them the name of someone to get more drugs from.
11. The deputies also made humiliating and sexual remarks about my genitals and told me I would be raped in prison.
12. The deputies also threatened to sodomize me with the flashlight.
13. After those assaults and threats, I was led to a police car. On my way to the police car, Brett McAlpin pushed me to the ground. Because I was handcuffed, I landed face first.
14. I was indicted in 2015. The prosecution claimed that I had sold 2.28 grams of methamphetamine to the informant. Brett McAlpin, as well as the informant, later testified to this theory at trial. There was no video or audio evidence of this supposed drug sale.
15. So the case against me boiled down to the word of RCSD deputies and their informant.

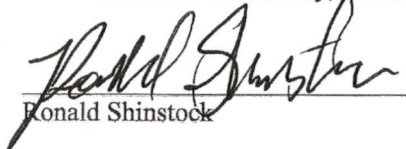
16. I retained an attorney to represent me. My attorney and I reviewed the discovery that the prosecution provided to us.
17. As far as I know, the prosecution never provided my attorney with any information in discovery about previous bad behavior by Brett McAlpin or other RCSD deputies.
18. So, even though I knew that Brett McAlpin had attacked me, threatened me, and tried to coerce me into accusing someone else of a crime in order to save myself from beatings and sexual assaults, I had to defend my case without knowing whether RCSD deputies had ever done that to anyone else, including the informant who was accusing me of a crime.
19. I went to trial on May 3, 2016. My trial lasted one day.
20. I was found guilty and sentenced to an enhanced sentence of 40 years' imprisonment.
21. I now understand that Brett McAlpin and other RCSD deputies known as the "Goon Squad" have confessed to serious and widespread misconduct. My story was covered in two *New York Times* articles entitled: *How a 'Goon Squad' of Deputies Got Away With Years of Brutality*; and *Stories of Alleged Brutality by a Mississippi Sheriff's Department*, dated November 30, 2023, and December 23, 2023, respectively.
22. If I had known that Brett McAlpin and other RCSD deputies had regularly used tactics such as beatings, abuse, torture, humiliation and even sometimes planted evidence including narcotics and "throw away" guns, I would have insisted that my defense attorney use that information at trial to impeach Brett McAlpin's testimony. I also would

have testified about how McAlpin and other RCSD deputies treated me, because I would have known that the prosecution could not have contradicted my testimony without impeachment evidence coming in at trial.

23. Since the public revelations and media coverage of the "Goon Squad" abuse and their numerous violations of the constitutional rights of people in Rankin County, as well as their subsequent convictions and sentencing, nobody from the Rankin County District Attorney's Office or the Mississippi Attorney General's Office has reached out to me about reviewing my case.

24. To this day, I do not know if the Rankin County District Attorney's office has reviewed my case for unconstitutional conduct by the arresting law enforcement officers, or regarding the integrity of my conviction.

Executed on January, 14 2026.

  
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Ronald Shinstock